

LAW OFFICES OF ALI AND BAINS PC
118-35 QUEENS BLVD
FOREST HILLS NY 11375
PH (718) 544-8000
FX 718) 480-1244
tbains@alibainsfirm.com

February 12, 2020

BY ECF ONLY

The Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Mircea Constantinescu*, 19 Cr. 651 (LTS)

Dear Judge Swain:

After further review our office is requesting that we be discharged as counsel for Mircea Constantinescu and he be assigned pro-bono counsel. The conflict we referred to in our January 20, 2020 letter is substantially more serious than we initially thought.

I believe that our contacts with Mr. Florian will severely prejudice either Mr. Constantinescu or Mr. Florian if we continue as Mr. Constantinescu's counsel..

Respectfully submitted,
Tejinder Bains
Attorney for Mircia Constantinescu